

STATE OF WASHINGTON  
GAMBLING COMMISSION

RECEIVED

DEC 22 2010

GAMBLING COMMISSION  
COMM & LEGAL DIVISION

In the Matter of the Revocation of the )  
License to Conduct Gambling Activities of: )

NO. CR 2010-00987

RECEIVED

CR 2010-01357

Christina Lee )  
Auburn, Washington, )

**SETTLEMENT ORDER**

DEC 30 2010

Licensee. )  
\_\_\_\_\_ )

GAMBLING COMMISSION  
COMM & LEGAL DEPT

This Settlement Order is entered into between the Washington State Gambling Commission and Christina Lee. The Gambling Commission is represented by H. Bruce Marvin, Assistant Attorney General, and Melinda Froud, Lead Staff Attorney. The licensee is representing herself.

I.

The Washington State Gambling Commission issued license number 68-03540 to Christina Lee, authorizing Card Room Employee activity, formerly with Silver Dollar Casino in Renton and formerly with Palace Casino in Lakewood.

This license expires on May 22, 2011, and was issued subject to the licensee in compliance with state gambling laws and regulations.

II.

The Director issued a Notice of Administrative Charges and Opportunity for an Adjudicative Proceeding to Christina Lee on October 22, 2010. On October 28, 2010, Commission staff received the licensee's Request for Hearing. The Director issued Amended Administrative Charges on December 14, 2010.

III.

1) Ms. Lee admitted that she realized that her chip tray had a \$60 overage, but did not report it to her supervisor. Instead, she deposited the \$60 overage into her token box,<sup>1</sup> cashed out all the chips in her token box, including the \$60 overage, and took the money as her own.

2) As a result of her actions, on November 17, 2010, Ms. Lee was charged with Theft, third degree, in Lakewood Municipal Court. Additionally, Ms. Lee has two Theft, third degree convictions and a Shoplifting conviction.

3) Ms. Lee pursued economic gain in an occupational manner which creates probable cause to believe that her participation in gambling or related activities would be detrimental to the proper operation of an authorized gambling or related activity in this state.

<sup>1</sup> The dealers receive tips from patrons and place them into a drop box called a token box.

4) Ms. Lee engaged in an act, practice, or course of operation that operated as fraud or deceit on her employer at the time, Palace Casino, in violation of RCW 9.46.190. As a result, she poses a threat to the effective regulation of gambling and failed to establish by clear and convincing evidence the necessary qualifications for licensure under RCW 9.46.153(1).

5) Therefore, grounds exist to revoke Christina Lee's license under RCW 9.46.075(1), (4), (8), (9), and (10), and WAC 230-03-085(1) and (8).

**RCW 9.46.075 Denial, suspension, or revocation of license, application, or permit**

The Commission may deny an application, or suspend or revoke any license or permit issued by it, for any reason or reasons, it deems to be in the public interest. These reasons shall include, but not be limited to, cases wherein the applicant or licensee, or any person with any interest therein: (The following subsections apply.)

(1) Has violated, failed or refused to comply with the provisions, requirements, conditions, limitations or duties imposed by chapter 9.46 RCW and any amendments thereto, or any rules adopted by the Commission pursuant thereto, or when a violation of any provision of chapter 9.46 RCW, or any Commission rule, has occurred upon any premises occupied or operated by any such person or over which he or she has substantial control.

(4) Has been convicted of, or forfeited bond upon a charge of, or pleaded guilty to larceny.

(8) Fails to prove, by clear and convincing evidence, that he, she or it is qualified in accordance with the provisions of this chapter.

(9) Is subject to current prosecution or pending charges, or a conviction which is under appeal, for any of the offenses included under subsection (4) of this section: PROVIDED, That at the request of an applicant for an original license, the Commission may defer decision upon the application during the pendency of such prosecution or appeal.

(10) Has pursued or is pursuing economic gain in an occupational manner or context which is in violation of the criminal or civil public policy of this state if such pursuit creates probable cause to believe that the participation of such person in gambling or related activities would be inimical to the proper operation of an authorized gambling or related activity in this state. For the purposes of this section, occupational manner or context shall be defined as the systematic planning, administration, management or execution of an activity for financial gain.

**WAC 230-03-085 Denying, suspending, or revoking an application, license or permit**

We may deny, suspend, or revoke any application, license or permit, when the applicant, licensee, or anyone holding a substantial interest in the applicant's or licensee's business or organization:

(The following subsections apply.)

(1) Commits any act that constitutes grounds for denying, suspending, or revoking licenses or permits under RCW 9.46.075.

(8) Poses a threat to the effective regulation of gambling, or creates or increases the likelihood of unfair or illegal practices, methods, and activities in the conduct of gambling activities, as demonstrated by: (a) Prior activities; or (b) Criminal record; or (c) Reputation; or (d) Habits; or (e) Associations.

**RCW 9.46.190 Violations relating to fraud or deceit**

Any person or association or organization operating any gambling activity who or which, directly or indirectly, shall in the course of such operation:

(The following subsections apply.)

(1) Employ any device, scheme, or artifice to defraud; or

(3) Engage in any act, practice or course of operation as would operate as a fraud or deceit upon any person.

Shall be guilty of a gross misdemeanor subject to the penalty set forth in RCW 9A.02.021.

**RCW 9.46.153(1) Applicants and licensees — Responsibilities and Duties**

It shall be the affirmative responsibility of each applicant and licensee to establish by clear and convincing evidence the necessary qualifications for licensure of each person required to be qualified under this chapter, as well as the qualifications of the facility in which the licensed activity will be conducted.

IV.

The licensee has waived her right to a hearing, based on the terms and conditions of this Settlement Order. The licensee further agrees to the following:

1) **Christina Lee shall surrender her Card Room Employee license. Ms. Lee is not currently working as a Card Room Employee. The signed Settlement Order must be received by Commission staff on or before December 28, 2010, and mailed to Commission Headquarters at the following address:**

Washington State Gambling Commission  
Attention: Communications and Legal Division  
P.O. Box 42400  
Olympia, WA 98504-2400

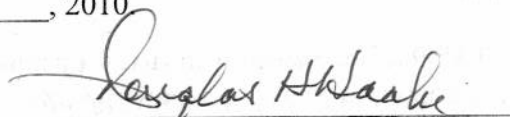
**or delivered** (in person or via private courier) to the following address:

Washington State Gambling Commission  
4565 7<sup>th</sup> Avenue SE; Fourth Floor  
Attention: Communications and Legal Division Lacey, WA 98503

2) In the event Christina Lee reapplies for a gambling license, she will be subject to all the Commission's investigative procedures for processing an application for a gambling license. Furthermore, no promises or assurances have been made to her that she will receive a license from the Commission should she reapply.

3) Christina Lee shall have no involvement, directly or indirectly, whether paid or unpaid, in the operation, ownership, or financing of any business in Washington State which is applying for, or holds, a gambling license or is involved with any gambling activity, including punchboard/pull-tab activity. However, this does not prevent her from working in any capacity in any non-gambling activity, such as employment in restaurants located in establishments engaged in authorized gambling activity.

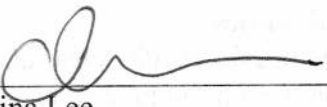
DATED this 29 day of DECEMBER, 2010




Administrative Law Judge

APPROVED FOR ENTRY:


By her signature, the licensee  
acknowledges reading the Settlement Order,  
and understands the terms and conditions  
contained in it.

  
\_\_\_\_\_  
Christina Lee  
Licensee

12/28/10  
(Date)

  
\_\_\_\_\_  
Melinda Froud, WSBA# 26792  
Lead Staff Attorney  
Washington State Gambling Commission

APPROVED AS TO FORM:

  
\_\_\_\_\_  
H. Bruce Marvin, WSBA# 25152  
Assistant Attorney General,  
Representing the Washington State  
Gambling Commission